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WESTERN DISTRICT OF TEXAS  
BY De DEPUTY

District Court of the United States

655 East Cesar Chavez Blvd.

San Antonio, Tx 78206

SA 15-CR-639-OLG

Re: USA v Pedro Dehoyos-Martinez case # 5:15-MJ-715 and his Sixth Amendment Constitutional rights.

Honorable District Court of the United States,

My name is Bianca De Hoyos, and I am the wife/daughter of Pedro Dehoyos, the defendant named in the above stated cause of action. It is common knowledge that all criminal defendant's enjoy the right under the Sixth Amendment to the effective assistance of counsel. In addition, if the defendant waives his right knowingly and intentionally, to the assistance of counsel. The Sixth Amendment entitles him to the right to self representation. See Powell v Alabama 287 U.S. 45(1932), Glasser v U.S. 315 U.S. 60(1947), and Faretta v California 422 U.S. 806(1975). Equally important is that the Sixth Amendment also entitles a defendant to "conflict free counsel". See Cuyler v Sullivan 466 U.S. 348(1980).

Presently counsel of record for my husband/father, Mario Trevino, has been rendering his assistance grossly ineffective. This is not even mentioning the fact that there exists a clear conflict of interest in the case, i.e. a complete breakdown of communication, that is irreconcilable and is preventing my husband/father from presenting an adequate defense. In as much counsel has not only made willful material misrepresentations of fact and applicable law concerning the defense in the instant matter. But has relayed to my husband/father and to our family that he is not going to:

1) object to court records (i.e. the charging documents) that falsely state that my husband/father was convicted of an "aggravated robbery" (under 29.03). When the State of Texas J & C and other state court records disclose he pled to and was convicted under Texas Pen. Code 29.02 (robbery); and

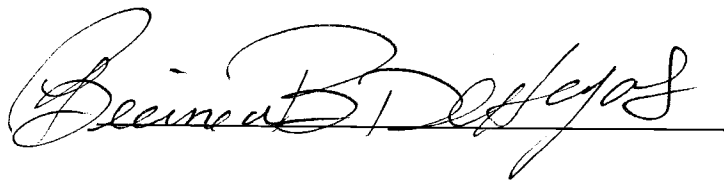
2) or present this court with indisputable documentary evidence. That not only proves my husband/father is actually innocent of "Illegal Re-entry", but is so because he is a Citizen of the United States by birth...

Instead counsel has done everything in his power to discourage my husband/father from addressing the court personally and making any mention of the documentary evidence that proves his innocence, to

this court. He has even gone as far as to state that my husband/father has no Sixth Amendment right to call on witnesses for his defense.

It is at this time that we not only as family members, but as members of the Public. Implore this court to 1) grant my husband's/father's motion to dismiss counsel of record for ineffective assistance of counsel and for the conflict of interest that exist's in his case: 2) grant my husband's/father's motion for self representation; and 3) ensure that his right to Compulsory Process (right to call witnesses in behalf of his defense) under the Sixth Amendment is safeguarded. By contacting Bureau of Prison's Officials at USP Yazoo City, P.O. Box 5000, Yazoo City, MS 39194 and arranging with them a time and place for Jesse Ramirez # 31805-180 can utilize a telephone or video monitor in which he can participate as a lay/expert witness in my husband's/father's defense.

Sincerely A Loving and Devout Wife/ Loving Daughter

A handwritten signature in cursive script, reading "Beanie B. Deford", written over a horizontal line.

dated: November 5, 2015

Bianca Delgado  
1818 Rogers Rd Apt 417  
San Antonio, TX  
78201

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